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December 15, 2005

By email w/o attach

By mail w/ attach

MLPA Public Comments  
c/o The California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
Attn: Melissa Miller-Henson

RE: Review and Evaluation of CCRSG Candidate MPAs and Status Quo

Dear Members of the Blue Ribbon Task Force:

This letter forwards two requests for consideration by the Blue Ribbon Task Force.

1. A recommended methodology for policy makers to rate relative levels of risk for activities in candidate Marine Protected Areas.
2. A request by United Anglers of Southern California for a deliberate status quo evaluation of the central coast portion of a statewide marine protected area utilizing existing regulations.

Item one. UASC recommends a cost effective, transparent and deliberate process by which activities allowed in MPAs may be rated on a relative scale based upon their inherent attributes compared to a pre-regulatory state. Deciding relative levels of protection to be allowed within MPAs is very clearly a policy decision. In order to ensure policy decisions are based upon sound science, socio-economics, and the goals of the public; careful attention needs to be given to how risk is determined and mitigated within MPAs.

By carefully documenting the steps involved at arriving at these decisions, users of MPAs will clearly understand the basis of standards. Understanding will provide motivation for finding innovative approaches to conservation and aid in adaptively managing MPAs. Additionally a transparent process for establishing standards is the only route for obtaining wide stakeholder acceptance which is necessary to ensure the success of the MPAs and the affordability of enforcement.

Attached is a study funded by Pew Charitable Trusts. Shifting Gears, 2003. This study describes a cost and time effective approach for initially rating inherent risk for activities within MPAs. Also, attached is a white paper prepared by UASC discussing the study and its applicability to the MLPA.

RE:

Most importantly, this study represents a methodology that can be rapidly completed in approximately 1 to 3 meetings, with the shorter timeframe being possible if the findings of the Pew study are adopted without much modification.

Either way would allow for a complete CCRSG package to be forwarded to the Fish and Game Commission in a timely manner.

Item two: UASC has requested the Fish and Game Commission to consider establishing a statewide master MPA to ensure the standards of the MLPA are completely fulfilled. To aid the commission in evaluating that request, UASC requests that the BRTF and CCRSG review the current regulatory status quo within the entire CCRSG study area ideally using the methodology presented above. UASC believes California has been leading the world in conservation efforts and has already prohibited the use of pelagic longlines, bottom trawls, and gillnets from extensive areas near to shore, encompassing a vast majority of state waters. It's important that previous conservation efforts be credited to the extent they are contributing to the goals and objectives of the MLPA using methodologies envisioned in the MLPA.

Sincerely,

/s/ Bob Osborn

Bob Osborn  
Fishery Consultant, United Anglers of Southern California

2 Attachments

Cc: L. Ryan Broddrick, Director, California Department of Fish and Game  
Robert R. Treanor, Executive Director, California Fish and Game Commission  
Brian Baird, Asst. Secretary for Ocean and Coastal Policy, California Resources Agency  
Dr. Elliott A. Norse, President, Marine Conservation Biology Institute